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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Amendment of Sections 2.302) RM- _____
and 97.3 of the Rules)
Governing the Administration)
of Special Event Call Signs)
in the Amateur Radio Service)

To: The Commission

PETITION FOR RULE MAKING

The American Radio Relay League, Incorporated (the League), the national association of amateur radio operators in the United States, by counsel and pursuant to Section 1.401 of the Commission's Rules (47 C.F.R. §1.401), hereby respectfully requests that the Commission issue a Notice of Proposed Rule Making at an early date, looking toward the amendment of Sections 2.302 and 97.3(a)(11)(iii) of the Commission's rules [47 C.F.R. §§2.302, 97.3(a)(11)(iii)] to expand the flexibility of the administration of special event call signs in the Amateur Service. Specifically, the proposed changes would (1) include in the definition of "special event call signs" those call signs denoting United States territories and possessions having no mailing address, the use of which would be limited to locations corresponding to and denoted by the call sign; and (2) permit the use of call signs in formats in addition to the "one letter, one digit, one letter" format currently authorized. As good cause for the changes proposed herein, and as set

forth in the attached Appendix, the League states as follows:

I. Background

1. The Commission has stated that its regulatory goal overall is to serve its licensees more effectively by improving license processing, increasing operational flexibility, and minimizing regulation where appropriate. *Report and Order*, FCC 97-99, 7 CR 92, at 93, released April 1, 1997. Recently, it has taken certain actions in the Amateur Service that contribute to that goal. In WT Docket 95-57, the Commission, *inter alia*, established a special event call sign system to be administered by Commission-nominated, private-sector, special event call sign administrators. The administrators would cooperate in the administration of the 750 call signs in a single call sign format, consisting of one letter, a digit between 0 and 9, and a single letter suffix (commonly referred to as "one-by-one" or "1 X 1" call signs). These rather unique call signs are used temporarily by amateur stations during events of special significance to the Amateur Service. As the Commission noted, these special call signs, when used on air, assist in bringing publicity and attention to these special events, and the public service participation of amateur radio operators in the event. For purposes of station identification, the Commission-assigned call sign of the station is to be used once per hour, in addition to the 1 X 1 call sign. In all respects, the special event call sign program is entirely self-administered within the Amateur Service.

2. The Commission designated this one unique block of call signs for special event assignment, stating: "(f)urther, we do not agree that a larger block of special event call signs would be necessary to fully accommodate the demand. Moreover, we do not have additional call signs to assign for this purpose given that such call signs would have to be taken from the

sequential and vanity call sign systems, thus denying them to amateur radio operators who want them assigned to their primary and club stations." *Id.*, at paragraph 16. While it is correct that additional blocks of call signs are not necessary in order to meet the quantity of demand for special event call signs overall (because the 1 X 1 call sign block consists of 750 unique call signs, and because each is to be used only for short periods of time, thus permitting rapid reassignment of each one) there is a great deal of interest in additional special event call sign formats, which would allow the call sign to symbolize the particular event or type of event. Because the 1 X 1 format does not readily adapt itself to this type of application, the League requests that several additional call sign blocks, not currently used for amateur (or non-amateur) primary station identification, be made available for special call sign administration by the private sector administrators.

3. The League enrolled with the Commission at the outset of the special event call sign program as a special event call sign administrator, and has addressed all requests made of it for 1 X 1 call signs. Demand for these call signs is low: during the first six weeks of the program, only 54 call signs were coordinated in total. The League coordinated 35 of those itself. As of May 5, 1998, seven months after the commencement of the program, only 237 call sign reservations had been coordinated in total. The League has noted significant demand, however, for special event call signs outside the 1 X 1 block. There is also significant demand for assignment of call signs for amateur radio expeditions to locations under United States jurisdiction which do not have mailing addresses.

II. Expedition Call Signs

4. Given the nature of the Commission's rules, though there are call sign blocks with prefixes specifically designating certain United States territories and possessions, a licensee may not, under the sequential or vanity call sign programs, obtain a primary or club station call sign from these blocks for many of them, because the locations, such as Desecheo Island near Puerto Rico, or Kingman Reef in the Pacific Ocean, are uninhabited and have no mailing addresses¹. United States Amateur licensees regularly travel to these locations for radio expeditions. Call signs with these prefixes are readily identifiable, and could be added to the special event call sign blocks for administration by special event call sign administrators for limited periods, for amateur radio expeditions at the location denoted by the call sign prefix. This would not detract from the blocks that are assigned or assignable through the sequential or vanity call sign programs administered by the Commission, and would not deprive anyone of a call sign that he or she might want for their primary or club station. Should those areas without mailing addresses develop such, the blocks could be easily deleted from special event call sign availability by the Commission at a later date by public notice, or by notice to the call sign administrators.

5. Thus, the League requests that the Commission amend Section 97.(a)(11)(iii) of the Commission's Rules to include in the definition of "special event call signs", those call signs

¹ Section 97.19(d)(4) states as follows:

(4) A call sign designated under the sequential call sign system for Alaska, Hawaii, Caribbean Insular Areas, and Pacific Insular areas will be assigned only to a primary or club station whose licensee's mailing address is in the corresponding state, commonwealth or island. This limitation does not apply to an applicant for the call sign as the spouse, child, grandchild, stepchild, parent, grandparent, stepparent, brother, sister, stepbrother, stepsister, aunt, uncle, niece, nephew, or in-law, of the former holder now deceased.

denoting locations having no mailing address. The use of these call signs would be limited to those locations corresponding to the call sign.

II. Additional Call Sign Formats

6. Special Event Call Sign formats that can be adapted to signify more precisely the special event being commemorated by the amateur radio operation are in demand for that reason, as noted above. In the past, the Commission has permitted such call sign use, and certain recent instances of unique special events have triggered additional requests therefor. For example, during the recent Olympic Games in Atlanta, Georgia, the Commission permitted radio amateurs in Georgia to utilize two numbers in their call signs to commemorate the year of the Games. The same type accommodation was made some years ago during the United States Bicentennial Celebration. The Commission also permitted the use of a call sign with two digits (in this instance, "50") to commemorate the 50th anniversary of the founding of the Central Intelligence Agency.

7. The primary impediment to the establishment of a routine procedure for the use of call signs in these additional formats in the Amateur Service is that the call signs of this kind are not envisioned in the international Radio Regulations or the Commission's rules. RR S19.50 of the ITU Regulations stipulates that in a call sign for any station, "(t)he first two characters shall be two letters or a letter followed by a digit or a digit followed by a letter. The first two characters or in certain cases the first character of a call sign constitute the nationality identification." In the special case of half-series, which does not apply to the United States, the first three characters are required for nationality identification. For call signs beginning with K, N, and W (among others), only the first character is required for nationality identification.

8. Another ITU Radio Regulation, RR19.68, is applicable as well. That states that call signs for amateur stations shall be one or two characters and a single digit followed by a group of not more than three letters. Thus, while a call sign with three numbers in the prefix, such as "W200AW" would not meet the prescribed international format for an amateur call sign, "W25ABC" would, since the call sign consists of a letter (W) followed by a digit (2), followed by another digit (5), followed by a suffix consisting of not more than three letters.

9. The Commission's rules, however, do not speak in terms of "characters", but rather of "letters". Therefore, the two-number prefix could not be used under the current rules. Section 2.302 of the Rules limits call signs for amateur stations to the following formats:

- 1 letter, 1 digit, 1 letter (letter "X" may not follow digit)
- 1 letter, 1 digit, 2 letters
- 1 letter, 1 digit, 2 letters
- 2 letters, 1 digit, 1 letter
- 2 letters, 1 digit, 2 letters
- 2 letters, 1 digit, 3 letters (letter "X" may not follow digit)

10. Elsewhere in Section 2.302, the call sign format for television broadcast translators is specified as "one letter, channel output number, 2 letters." For single-number television channels, a zero is inserted in the call sign before the number, so that there are two-number call signs typically for broadcast television translators. This would remove some, but not all, of the "1-letter, 2-number, 2-letter" combinations from use by amateur stations (e.g. those beginning with the letters W or K), but call signs such as "W73A", "N75TA", "K50CIA", etc. would continue to be available. Thus, the League requests amendment of Section 2.302 of the Commission's rules to include the following additional formats as call signs for Stations in the Amateur Service, and to amend Section 97.3(a)(11)(iii) to permit their use in the special event call sign program:

1 letter, 1 digit, the letter "X"²
1 letter, 2 digits, 1 letter
The letter "N", 2 digits, 2 letters
1 letter, 2 digits, 3 letters

III. Conclusion

11. The foregoing additional call sign formats would not accommodate all combinations of special event call signs desired by amateur licensees from time to time, but it would permit significantly increased flexibility in private sector special event call sign administration, without any adverse impact on those who would desire vanity call signs, or call signs assigned by the Commission sequentially. With respect to the expedition call signs using prefixes denoting locations for which there is no mailing address, there is significant demand for these, and no present means of assigning the call signs. No additional regulatory burden on the Commission would occur from this proposal, and it would "serve (the Commission's) licensees more effectively by improving license processing, increasing operational flexibility, and minimizing regulation where appropriate". In addition, the relief requested in this petition is both deregulatory and consistent with the tradition of the Amateur Service as a model of self-administration and self-regulation.

Therefore, the foregoing considered, the American Radio Relay League, Incorporated requests that the Commission issue a Notice of Proposed Rule Making at an early date, proposing to amend Sections 2.103 and 97.3(a)(11)(iii) of the Commission's rules as proposed herein, and in the attached Appendix, to expand the flexibility of the administration of special

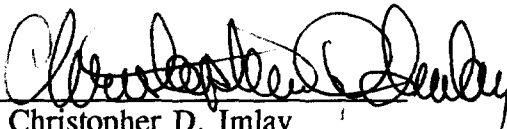
² The Commission's Rules, at Sections 2.302 and 97.2(a)(11)(iii), prohibit the use of suffixes beginning with the letter "X" in a 1 X 1 Amateur call sign, presumably because the suffix is used in other call sign formats for experimental stations. However, there is no conflict in the 1 X 1 format ending with the letter "X" with call sign usage in other services, and hence no reason why the "X" cannot be used for amateur 1 X 1 special event call signs.

event call signs in the Amateur Service.

Respectfully submitted,

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APPENDIX

1. Section 2.302 of the Commission's Rules is amended to read as follows:

Class of Station	Composition of call sign	Call sign blocks

Amateur	1 letter, 1 digit, 1 letter	K1A through K0Z N1A through N0Z W1A through W0Z
Do	1 letter, 1 digit, 2 letters	K1AA through K0ZZ N1AA through N0ZZ W1AA through W0ZZ
Do	1 letter, 1 digit, 3 letters	K1AAA through K0ZZZ N1AAA through N0ZZZ W1AAA through W0ZZZ
Do	1 letter, 2 digits, 1 letter	K00A through K99Z N00A through N99Z W00A through W99Z
Do	letter "N", 2 digits, 2 letters	N00AA through N99ZZ
Do	1 letter, 2 digits, 3 letters	K00AAA through K99ZZZ N00AAA through N99ZZZ W00AAA through W99ZZZ
Do	2 letters, 1 digit, 1 letter	AA1A through AL0Z KA1A through KZ0Z NA1A through NZ0Z WA1A through WZ0Z
Do	2 letters, 1 digit, 2 letters	AA1AA through AL0ZZ KA1AA through KZ0ZZ NA1AA through NZ0ZZ WA1AA through WZ0ZZ
Amateur (letter "X" may not follow digit)	2 letters, 1 digit, 3 letters	AA1AAA through AL0ZZZ KA1AAA through KZ0ZZZ NA1AAA through NZ0ZZZ WA1AAA through WZ0ZZZ

2. Section 97.3(a)(11)(iii) of the Commission's Rules is amended to read as follows:

(iii) Special event call sign system. The call sign is selected by the station licensee from a list of call signs shown on a common data base coordinated, maintained and disseminated by the

amateur station special event call sign data base coordinators. The call sign must be in one of the following formats: 1 letter, 1 digit, 1 letter; 1 letter, 2 digits, 1 letter; The letter N, 2 digits, 2 letters; or 1 letter, 2 digits, 3 letters. Alternatively, the call sign can be in an any format permitted for amateur stations by Section 2.302 of the Commission's Rules, provided that it utilizes a prefix denoting a United States territory or possession having no mailing address, and provided that the use of the call sign is to be limited to the location corresponding to that call sign. A list of such possessions or territories will be provided to the special event call sign data base coordinators by the Commission from time to time.